From: John Ubels

Sent: Thursday, December 16, 2004 12:18 PM

To: NIEHS ICCVAM

Subject: Public comment on BCOP BDR

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Attached is a public comment delivered in response to Federal Register Notice volume 69, Number 212, Pages 64081-64082. It addresses Background Review Document (BRD), "Current Status of In Vitro Methods for Identifying Ocular Corrosives and Severe Irritants: the Bovine Opacity and Permeability (BCOP) Test Method", November 1, 2004.

I have also attached the evaluation of the BCOP assay that I wrote in 1996 and referred to in my letter. My comments and several publication reprints have been sent to Dr. Stokes by US mail.

John L. Ubels, Ph.D.

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